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Food Safety And Inspection Service
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AUDIT REPORT FOR ISRAEL

FEBRUARY 26 THROUGH MARCH 17, 2002

INTRODUCTION

Background

This report reflects information that was obtained during an audit of Israel's poultry inspection system from February 26 through March 17, 2002. Ten of the 17 establishments certified to export poultry to the United States were audited. Seven of these were slaughter establishments; the other three were conducting processing operations.

The last audit of the Israeli meat inspection system was conducted in May/June 2001. Nine establishments were audited: all were evaluated as acceptable.

Israel exports only processed poultry products to the United States. Restrictions are placed on Israeli fresh poultry due to the presence of Newcastle's Disease. Meat products are not eligible because USDA does not recognize Israel's meat inspection system as equivalent.

During the calendar year of 2001, Israel establishments exported nearly 2 million pounds of processed poultry products to the United States that included chicken, turkey, duck and goose products. There were no rejections.

PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with Israeli national poultry inspection officials to discuss oversight programs and practices, including enforcement activities. The second entailed an audit of a selection of records in the poultry inspection headquarters facilities preceding the on-site visits. Establishments for the records review were selected on a random basis by computer from the list of 16 establishments certified as eligible to export poultry products from Israel to the United States. Upon arrival, we were notified that one establishment had been delisted at its request. That establishment was replaced by three new establishments. The establishments selected for the on-site visits were randomly selected by computer from the list of establishments already selected for records review. The third was conducted by on-site visits to establishments. The fourth was a visit to three laboratories, one was a government laboratory conducting analytical testing of field samples for the national residue testing program, and each of the other two were private laboratories culturing field samples for the presence of microbiological contamination with *Salmonella* and *E. coli*.

Israel's program effectiveness was assessed by evaluating five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOPs), (2) animal disease controls, (3) residue controls, (4) slaughter/ processing controls, including the implementation and operation of Hazard Analysis and Critical Control Point (HACCP) systems and the *E. coli* testing program, and (5) enforcement controls, including the testing program for *Salmonella* species.

During all on-site establishment visits, the auditor evaluated the nature, extent, and degree to which findings impacted on food safety and public health, as well as overall program delivery. The auditor also determined if establishment and inspection system controls were in place. Establishments that do not have effective controls in place to prevent, detect and eliminate product contamination/adulteration are considered unacceptable and therefore ineligible to export products to the U.S., and are delisted accordingly by the country's meat inspection officials. (This was not the case in Israel.)

RESULTS AND DISCUSSION

Summary

Effective inspection system controls were found to be in place in all of the 10 establishments audited. Details of audit findings, including compliance with HACCP, SSOPs, and testing programs for *Salmonella* and generic *E. coli*, are discussed later in this report.

There were no major concerns identified during the last audit of the Israeli poultry inspection system.

Entrance Meeting

On Wednesday, February 27, 2002, an entrance meeting was held in the Beit-Dagan offices of the Israel Veterinary Services and Animal Health, and was attended by the following individuals: Dr. Judd Giezentanner, International Audit Staff Officer, FSIS, Dr. Eliezer Wittmann, HACCP Project Manager, Dr. Michael Chirik, South Area Supervisor, Dr. Karol Vigvari, North Area Supervisor, Dr. Eliezer Nili, Department Head, International Division. Topics of discussion included the following:

1. Delistment of one establishment by its request.
2. Review itinerary.
3. Replacement of delisted establishment with new establishments.
4. Discussion of the current political climate in Israel and its effect on inspection and the itinerary.
5. Israel's "born in the USA" policy, and why and how I was not empowered to discuss nor negotiate terms with them.
6. General discussion of Israel's kosher requirements.
7. Israel's importation of beef from Argentina and Brazil.

Headquarters Audit

There had been no changes in the organizational structure or upper levels of inspection staffing since the last U.S. audit of Israel's inspection system in May/June 2001.

To gain an accurate overview of the effectiveness of inspection controls, FSIS requested that the audits of the individual establishments be led by the inspection officials who normally conduct the periodic reviews for compliance with U.S. specifications. The FSIS auditor (hereinafter called "the auditor") observed and evaluated the process.

The auditor conducted a review of inspection system documents pertaining to the establishments listed for records review. This records review was conducted at the Inspection Service. The records review focused primarily on food safety hazards and included the following:

- Internal review reports
- Label approval records
- New laws and implementation documents such as regulations, notices, directives and guidelines.
- Sampling and Laboratory analyses for residues; Pathogen reduction and other food safety initiatives such as SSOPs, HACCP programs, and generic *E. coli* testing and Salmonella testing.
- Sanitation, slaughter and processing inspection procedures and standards.
- Control of products from livestock such as Newcastle Disease, etc., and of inedible and condemned materials.
- Export product inspection and control including export certificates.

The following concern arose as a result of the examination of these documents:

1. Israel stopped species identification testing two years ago because of tight government oversight and a 15-year history of no violations. They were requested to make a formal, written request for exclusion from this requirement and to immediately resume the testing program.

Government Oversight

All inspection veterinarians and inspectors in establishments certified by Israel as eligible to export poultry products to the United States were full time Israeli Veterinary Services and Animal Health employees, receiving no remuneration from either industry or establishment personnel.

Establishment Audits

Seventeen establishments were certified to export poultry products to the United States at the time this audit was conducted. Ten establishments were visited for on-site audits. In all of the 10 establishments visited, both Israel Veterinary Services and Animal Health inspection system controls and establishment system controls were in place to prevent, detect and control contamination and adulteration of products.

Laboratory Audits

During the laboratory audits, emphasis was placed on the application of procedures and standards that were equivalent to U.S. requirements. Information was also collected about the risk areas of government oversight of accredited, approved and private laboratories; intra-laboratory quality assurance procedures, including sample handling; and methodology.

The governmental Residue Control Laboratory in Bet Dagan was audited on March 12, 2002. Effective controls were in place for sample handling and frequency, timely analysis, data reporting, tissue matrices for analysis, equipment operation and printouts, minimum detection levels, recovery frequency, percent recoveries, and corrective actions. The methods used for analyses were acceptable. No compositing of samples was done.

Israel's microbiological testing for *Salmonella* was being performed in private laboratories. Two of these were audited. One of these was the Institute for Food Microbiology in Tirat Carmel, and the other was Bactochem Ltd. in Ness-Ziona. The auditor determined that both laboratories systems met the criteria established for the use of private laboratories under FSIS's Pathogen Reduction/HACCP rule. These criteria are:

1. The laboratories have been accredited/approved by the government, accredited by a third party accrediting organization with oversight by the government, or a government contract laboratory.
2. The laboratories have properly trained personnel, suitable facilities and equipment, a written quality assurance program, and reporting and record-keeping capabilities.
3. Results of analyses are being reported to the government or simultaneously to the government and establishment.

Establishment Operations by Establishment Number

The following operations were being conducted in the 10 establishments:

Turkey and chicken slaughter and boning/cutting – two establishments (018, 008)
Turkey slaughter and cutting – one establishment (003)
Turkey, chickens, ducks and goose slaughter and cutting and processed smoked and cooked sausages – one establishment (119)
Duck and goose slaughter and cutting – one establishment (014)

Goose slaughter and cutting – one establishment (011)
Turkey and goose processed smoked and cooked sausages – one establishment (104)
Turkey and chicken processed convenience foods – one establishment (186)
Turkey and chicken processed cured/smoked products – one establishment (108)
Turkey and chicken slaughter and boning/cutting, turkey and chicken processed convenience foods - one establishment (209)

SANITATION CONTROLS

Based on the on-site audits of establishments, Israel's inspection system had controls in place for effective maintenance program, pre-operational sanitation, operational sanitation, and waste disposal.

Sanitation Standard Operating Procedures (SSOPs)

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment A).

The SSOPs were found to meet the basic FSIS regulatory requirements, with only occasional minor variations.

ANIMAL DISEASE CONTROLS

Israel's inspection system had controls in place to ensure adequate animal identification, ante-mortem and post-mortem inspection procedures and dispositions, condemned and restricted product control, and procedures for sanitary handling of returned and rework product.

There were reported to have been no outbreaks of animal diseases with public-health significance since the previous U.S. audit.

RESIDUE CONTROLS

Israel's National Residue Testing Plan for 2002 was being followed, and was on schedule. The Israeli inspection system had adequate controls in place to ensure compliance with sampling and reporting procedures and storage and use of chemicals.

SLAUGHTER/PROCESSING CONTROLS

Except as noted below, the Israeli inspection system had controls in place to ensure adequate ante and post-mortem inspection procedures and dispositions, control and disposition of dead, dying, diseased or disabled animals, humane handling and slaughter and control of inedible and condemned materials.

HACCP Implementation

All establishments approved to export poultry products to the U.S. are required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic program. The data collection instrument used accompanies this report (Attachment B).

The HACCP programs were found to meet the basic FSIS regulatory requirements except that Establishment 018 had not performed the mandatory annual reassessment for the year 2001 as specified in FSIS Regulation 9 CFR 417.4 (a)(3).

The Israeli inspection forces were advised to issue a letter giving the establishment 30 days to bring their HACCP plan into compliance. Before this auditor left Israel, he had been notified that the established had completed, dated and signed their HACCP plan and was awaiting verification of the plan by the Israeli inspection service.

Testing for Generic *E. coli*

Israel has adopted the FSIS regulatory requirements for *E. coli* testing.

Seven of the establishments audited were required to meet the basic FSIS regulatory requirements for generic *E. coli* testing, and were audited and evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment C).

The *E. coli* testing programs were found to meet the basic FSIS regulatory requirements.

Additionally, establishments had adequate controls in place to prevent poultry products intended for Israeli domestic consumption from being commingled with products eligible for export to the U.S.

ENFORCEMENT CONTROLS

Inspection System Controls

The Israel inspection system controls [control of restricted product and inspection samples, boneless meat reinspection, shipment security, including shipment between establishments,

prevention of commingling of product intended for export to the United States with domestic product, monitoring and verification of establishment programs and controls (including the taking and documentation of corrective actions under HACCP plans), inspection supervision and documentation, the importation of only eligible livestock or poultry from other countries (i.e., only from eligible countries and certified establishments within those countries), and the importation of only eligible meat or poultry products from other countries for further processing] were in place and effective in ensuring that products produced by the establishment were wholesome, unadulterated, and properly labeled. In addition, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

Testing for *Salmonella* Species

Four of the establishments audited were required to meet the basic FSIS regulatory requirements for *Salmonella* testing, and were evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment D).

Israel has adopted the FSIS regulatory requirements for *Salmonella* testing with the exception of the following equivalent measures:

1. LABORATORIES: Private Laboratories. The criteria used for equivalence decisions for the use of private laboratories in lieu of government laboratories are:
   - The laboratory is accredited/approved by the government, accredited by a third-party accrediting organization with oversight by the government, or a government contract laboratory.
   - The laboratory has properly trained personnel, suitable facilities and equipment, a written quality assurance program, and reporting and record-keeping capabilities.
   - Results of analyses are reported to the government or simultaneously to the government and the establishment.

Species Verification Testing

At the time of this audit, Israel was not exempt from the species verification-testing requirement. The Israeli inspection service had not been conducting species verification for two years. They were advised to re-institute the program immediately. They were also advised to apply for exemption from the program and were advised of the items to be addressed in the application. The official response of the Israel Meat Inspection Service was that they would re-institute the species verification program immediately and also make application for exemption from the species verification requirements.

Monthly Reviews

These reviews were being performed by the Israel equivalent of District Managers.

Dr. Vigvare was in charge of the Northern District and Dr. Chirik was in charge of the Southern District with the addition of two duck slaughter establishments in the North.

The internal review program was not applied equally to both export and non-export establishments. The reviewing officials were in charge of the export establishments, only, and the export establishments were the only ones subject to the monthly reviews. Internal review visits were not announced in advance, and were conducted by the named individuals al least monthly, and sometimes two or three times within a month. The records of audited establishments were kept in the inspection offices of the individual establishments, and copies were also kept in the central Israel offices in Bet Dagan, and were routinely maintained on file for a minimum of 3 years.

In the event that an establishment is found, during one of these internal reviews, to be out of compliance with U.S. requirements, and is delisted for U.S. export, before it may again qualify for eligibility to be reinstated, the District Supervisor and the Head of the Foreign Establishment Export Program, Dr. Nili, will conduct an in-depth review. He will evaluate the results and the plans are developed by the establishment for corrective and preventive measures.

Enforcement Activities

Enforcement activities in Israel are vested in a branch of their government akin to our Justice Department. Investigations and prosecution of criminal cases, as well as administrative jurisdiction are handled by this same branch of the government.

Exit Meetings

An exit meeting was conducted in Bet Dagan on Sunday, March 17, 2002. The participants included: Dr. Oded Nir, Head of the Israel Veterinary Services and Animal Health; Dr. Eliezer Nili, Chief of the Poultry Export Division; and Dr. Judd Giezentanner, International Audit Staff Officer, FSIS. The following topics were discussed:

1. HACCP re-assessment by Establishment 018 and the 30-day deadline.
2. Species identification testing and the need to re-institute the program immediately with a follow-up letter asking for exemption from the requirements.
3. Audit plans for the coming year.
4. Monthly reviews by Supervisors.
5. Enforcement activities.
6. Effects of the West Bank strife on inspection activities.

CONCLUSION

The inspection system of Israel was found to have effective controls to ensure that product destined for export to the United States was produced under conditions equivalent to those that FSIS requires in domestic establishments. Ten establishments were audited. The deficiencies encountered during the on-site establishment audits were adequately address to the auditor's satisfaction.

Dr. Judd Giezentanner *(signed) Dr. Judd Giezentanner*
International Audit Staff Officer

ATTACHMENTS

A. Data collection instrument for SSOPs.
B. Data collection instrument for HACCP programs.
C. Data collection instrument for *E. coli* testing.
D. Data collection instrument for *Salmonella* testing.
E. Laboratory Audit Forms.
F. Individual Foreign Establishment Audit Forms.
G. Written Foreign Country's Response to the Draft Final Audit

Attachment A

Data Collection Instrument for SSOPs

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written SSOP program.
2. The procedure addresses pre-operational sanitation.
3. The procedure addresses operational sanitation.
4. The pre-operational procedures address (at a minimum) the cleaning of food-contact surfaces of facilities, equipment, and utensils.
5. The procedure indicates the frequency of the tasks.
6. The procedure identifies the individuals responsible for implementing and maintaining the activities.
7. The records of these procedures and any corrective action taken are being maintained on a daily basis.
8. The procedure is dated and signed by the person with overall on-site authority.

The results of these evaluations were as follows:

Est. #	1.Written program addressed	2. Pre-op sanitation addressed	3. Oper. sanitation addressed	4. Contact surfaces addressed	5. Frequency addressed	6. Responsible indiv. identified	7. Documentation done daily	8. Dated and signed
003	√	√	√	√	√	√	√	√
008	√	√	√	√	√	√	√	√
011	√	√	√	√	√	√	√	√
014	√	√	√	√	√	√	√	√
018	√	√	√	√	√	√	√	√
104	√	√	√	√	√	√	√	√
108	√	√	√	√	√	√	√	√
119	√	√	√	√	√	√	√	√
186	√	√	√	√	√	√	√	√
209	√	√	√	√	√	√	√	√

Documentation was also audited from the following establishments that were not visited on-site during the centralized document audit:

Est. #	1.Written program addressed	2. Pre-op sanitation addressed	3. Oper. sanitation addressed	4. Contact surfaces addressed	5. Frequency addressed	6. Responsible indiv. identified	7. Documentation done daily	8. Dated and signed
009	√	√	√	√	√	√	√	√
022	√	√	√	√	√	√	√	√
219	√	√	√	√	√	√	√	√

Attachment B

Data Collection Instrument for HACCP Programs

Each of the establishments approved to export meat products to the U.S. was required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. The establishment has a flow chart that describes the process steps and product flow.
2. The establishment has conducted a hazard analysis that includes food safety hazards likely to occur.
3. The analysis includes the intended use of or the consumers of the finished product(s).
4. There is a written HACCP plan for each product where the hazard analysis revealed one or more food safety hazard(s) reasonably likely to occur.
5. All hazards identified in the analysis are included in the HACCP plan; the plan lists a CCP for each food safety hazard identified.
6. The HACCP plan specifies critical limits, monitoring procedures, and the monitoring frequency performed for each CCP.
7. The plan describes corrective actions taken when a critical limit is exceeded.
8. The HACCP plan was validated using multiple monitoring results.
9. The HACCP plan lists the establishment's procedures to verify that the plan is being effectively implemented and functioning and the frequency for these procedures.
10. The HACCP plan's record-keeping system documents the monitoring of CCPs and/or includes records with actual values and observations.
11. The HACCP plan is dated and signed by a responsible establishment official.
12. The establishment is performing and documenting pre-shipment document reviews as required.

The results of these evaluations were as follows:

Est. #	1. Flow diagram	2. Haz. analysis –all ID'ed	3. Use & users included	4. Plan for each product	5. CCPs for all hazards	6. Monitoring is specified	7. Corr. actions are described	8. Plan validated	9. Adequate verific. procedures	10. Adequate documentation	11. Dated and signed	12. Pre-shipment doc. reviews
003	√	√	√	√	√	√	√	√	√	√	√	√
008	√	√	√	√	√	√	√	√	√	√	√	√
011	√	√	√	√	√	√	√	√	√	√	√	√
014	√	√	√	√	√	√	√	√	√	√	√	√
018	√	√	√	√	√	√	√	no*	√	√	√	√
104	√	√	√	√	√	√	√	√	√	√	√	√
108	√	√	√	√	√	√	√	√	√	√	√	√
119	√	√	√	√	√	√	√	√	√	√	√	√
186	√	√	√	√	√	√	√	√	√	√	√	√
209	√	√	√	√	√	√	√	√	√	√	√	√

* The HACCP plan meet the basic FSIS regulatory requirements except that Establishment 018 had not performed the mandatory annual reassessment for the year 2001 as specified in FSIS Regulation 9 CFR 417.4 (a)(3).

Documentation was also audited from the following establishments that were not visited on-site during the centralized document audit:

Est. #	1. Flow diagram	2. Haz. analysis –all ID'ed	3. Use & users includ e-ed	4. Plan for each produc t	5. CCPs for all hazard s	6. Mon-itoring is spec-ified	7. Corr. actions are des-cribed	8. Plan valida-ted	9. Ade-quate verific. Proced -ures	10. Ade-quate docu-menta-tion	11. Dat-ed and signed	12. Pre-ship-ment doc. re-views
009	√	√	√	√	√	√	√	√	√	√	√	√
022	√	√	√	√	√	√	√	√	√	√	√	√
219	√	√	√	√	√	√	√	√	√	√	√	√

Attachment C

Data Collection Instrument for Generic *E. coli* Testing

Each slaughter establishment was evaluated to determine if the basic FSIS regulatory requirements for generic *E. coli* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written procedure for testing for generic *E. coli.*
2. The procedure designates the employee(s) responsible to collect the samples.
3. The procedure designates the establishment location for sample collecting.
4. The sample collection is done on the predominant species being slaughtered.
5. The sampling is done at the frequency specified in the procedure.
6. The proper carcass site(s) and/or collection methodology (sponge or excision) is/are being used for sampling.
7. The carcass selection is following the random method specified in the procedure or is being taken randomly.
8. The laboratory is analyzing the sample using an AOAC Official Method or an equivalent method.
9. The results of the tests are being recorded on a process control chart showing the most recent test results.
10. The test results are being maintained for at least 12 months.

The results of the documentation audited from the following establishments that were visited on-site were as follows:

Est. #	1.Written procedure	2. Sampler designated	3.Samp-ling location given	4. Predomin. species sampled	5. Sampling at the req'd freq.	6. Proper site or method	7. Sampling is random	8. Using AOAC method	9. Chart or graph of results	10. Results are kept at least 1 yr
003	√	√	√	√	√	√	√	√	√	√
008	√	√	√	√	√	√	√	√	√	√
011	√	√	√	√	√	√	√	√	√	√
014	√	√	√	√	√	√	√	√	√	√
018	√	√	√	√	√	√	√	√	√	√
119	√	√	√	√	√	√	√	√	√	√

Attachment D

Data Collection Instrument for *Salmonella* Testing

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for *Salmonella* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. Salmonella testing is being done in this establishment.

2. Carcasses are being sampled.

3. Ground product is being sampled.

4. The samples are being taken randomly.

5. The proper carcass site(s) and/or collection of proper product (carcass or ground) is being used for sampling.

6. Establishments in violation are not being allowed to continue operations.

The results of these evaluations were as follows:

Est. #	*1. Testing as required*	*2. Carcasses are sampled*	3. Ground product is sampled	4. Samples are taken randomly	5. Proper site and/or proper prod.	6. Violative est's stop operations
003	√	√	√	√	√	√
008	√	√	√	√	√	√
011	√	√	√	√	√	√
014	√	√	√	√	√	√
018	√	√	√	√	√	√
104	√	√	√	√	√	√
108	√	√	√	√	√	√
119	√	√	√	√	√	√
186	√	√	√	√	√	√
209	√	√	√	√	√	√